

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA, Plaintiff, vs. CHARLES DALZELL, Defendant.	Cr. No. 3:25-mj-466 DEFENDANT'S EXPEDITED MOTION FOR FURLough
--	---

Defendant Charles Dalzell, by his attorney Assistant Federal Public Defender Rhiannon Gorham, moves the Court for a temporary furlough so he may visit his mother, who is in poor health after a recent surgery.

Mr. Dalzell's mother recently had surgery and is in poor health. He is requesting that he be able to visit her so he has a chance to say goodbye in case she passes away soon.

Mr. Dalzell is currently in the United States Marshal's custody at the Grand Forks County Correctional Center in Grand Forks, North Dakota. He is requesting he be released in the morning so he can be picked up by 12:00 p.m. on Saturday, June 21, 2025, and return no later than 12:00 p.m. on Sunday, June 22, 2025. Mr. Dalzell's cousin, Brooks Stellon, would transport Mr. Dalzell from Grand Forks to Mr. Dalzell's mother's residence in Baudette, Minnesota, and transport him back to Grand Forks. Mr. Stellon will immediately call the U.S. Marshals if Mr. Dalzell violates any condition of the furlough. Mr. Stellon's phone number can be provided to the Court, U.S. Probation, and the U.S. Marshals upon request. Mr. Stellon is

also willing to sign any document assuming responsibility of Mr. Dalzell and acknowledging his obligation to call the U.S. Marshals if Mr. Dalzell violates any conditions of the furlough.

Dated this 20th day of June, 2025.

Respectfully submitted,

JASON J. TUPMAN
Federal Public Defender
By:

/s/ Rhiannon Gorham
Rhiannon Gorham
Assistant Federal Public Defender
Attorney for Defendant
Office of the Federal Public Defender
Districts of South Dakota and North Dakota
112 Roberts Street North, Suite 200
Fargo, ND 58102
Telephone: 701-239-5111
Facsimile: 701-239-5098
filinguser_SDND@fd.org